

Case No: 2:22-cv-11515
Hon. George Caram Steeh

14

Jesse Eden

Plaintiff,

v.

NICOLE KEINATH, ET AL,

Defendants.

FILED
AUG - 1 2022
CLERK'S OFFICE
U.S. DISTRICT COURT

Plaintiff is a pro se
Pretrial detainee at the Sanilac County
Jail and I object to the Opinion
And Order Of Partial Summary Dismissal.
Furthermore I request preserve and
Amend my complaint and cure what
the district court said was wrong
with it. So this is an Amended Complaint

as well as an Amended defendants List.

Defendants are as follows;

Deputy C. Abrego
65 N. Elk Street
Sandusky, MI. 48471

Sargent M. Tank
65 N. Elk Street
Sandusky, MI. 48471

Sargent J. Darling
65 N. Elk Street
Sandusky, MI. 48471

John Doe
65 N. Elk St
Sandusky, MI. 48471

Lieutenant Nicole Keinath
65 N. Elk Street
Sandusky, MI. 48471

continued...

Sargent Tracey Kensley
65 N. Elk Street
Sandusky, mi. 48471

Please Keep in mind that I have diligently tried to Get their names & address', however they have all conspired against me to with-hold that information. I wish to sue the above Listed defendants in both their personal & official capacities.

This is not only an amended Complaint but a Retaliation Claim as well.

With the respect to the partial Complaint already being filed

I will address how the actions &/or failure to act has impacted me with respect to Jon Doe as the plaintiff does not think he needs to reiterate what happened since the court has accepted that part of the Complaint.

On 3-11-22 I asked to be rehoused, Approximately 4 hours later Keinath responded "You classify to remain where you are at!" It should be noted that both Pods, E, where I asked to be moved to, and F pod, where I was at, both have cameras on inmates 24 hours a day.

On 3/19/22 @ 1:26 p.m. I asked to make a police report. Darling asked "Concerning what?" I responded that I was too afraid to tell anyone in house. Keinath ended the conversation on the cidnet Grievance tracker with, "I will be up to speak with you shortly." It should be noted she did not come speak with me until 4 days later. At this time I would ask that I add Sargent Morden as a Co-Conspirator/Defendant.

SGT. A. Morden
65 N. Elk St.
Sandusky, MI. 48471

On 3/20/22 @ 2:01 p.m. I asked on the cidnet machine for all the times I was placed on suicide watch. Morden responded "it was 11/20/20 and 12/26/2021" leaving out the time I was dressed out and sexually assaulted.

On 3-22-22 @ 10:28 A.m. I submitted a PREA Incident form Reporting a misconduct.

I stated "to afraid to put in a form. please keep me in F pod where there are cameras & people to witness my safe being. I've asked to speak with the Mich. State police & am repeatedly denied."

Sargent Tank Responded, "what do you mean you are afraid of submitting forms" & "there are inmates & cameras in all of our areas to record you." a couple hours later Sgt. Tank Denied my out going message at 3/22/22 @ 2:46 p.m denying my right to free speech & it was a no doubt out of retaliation. Then 3/22/22 @ 10:12 p.m. I wrote "To Sgt. Tank, You answered a grievance about the declined message. You stated that the message must have been against policy or security concern," & I sent that message out AGAIN, verbatim

EXACTLY the way it was typed out" & "it was approved on your shift, could you please, for the record, tell me who denied the first one & who approved the later message. ty"

This message went unresponded to as do many of my messages do when they pertain to crucial information. Or questions in relation to retaliation & the Freedom of speech. On 3-26-22 I was moved to B-29, a cell where there was no camera, out of retaliation. On 3-27-22 Deputy C. Abrego came into my cell, B-29 And punched me in the face.

3-27-22 Deputies found me on the floor, Once again, came into my cell, off of camera & Kicked my foot. Later that same day I was put in administrative segregation "the morning plan" & my visit was canceled so my visitor couldn't see my face (eye) swollen closed. On 5-22-22 I submitted a Grievance because my Mattress and blanket were taken from me by Sargent Kensely & Sargent Tank. Plaintiff has also told listed defendants of the cruel & unusual Punishment that is being inflicted →

daily by Long Lock ins (25.5 hours) every other day, From the time I have come into B-PoD until now, as this is an ongoing issue. Since being locked down for long periods, against the Community mental Health Doctors wishes, I have cut my wrists & attempted suicide more than once. I have wrote Sheriff Rich & undersheriff Torp in regards to the cruel & unusual punishment of the long lockins. I have made it abundently clear on multiple occasions to the above →

listed defendants that locking me down for long periods that violate the Laws are especially harmful to me as I suffer from mental illness, thus exhibiting the deliberate indifference standard. Every Listed defendant has also been made aware of the present unconstitutional prison condition & fail to act.

Last, plaintiff requests an order from the court to provide me with the information that I need to identify Jon Doe, I ask that the Sanilac County Jail

Officials be ordered to provide me, the plaintiff with, who Dressed me out, the Day & time I was dressed out, & the date & time I was cleared from suicide watch as well who was present when I Dressed. Plaintiff Moves the Court to Order the Sanilac County Jail Officials to reveal Jon Doe.

Plaintiff also seeks to be transferred to another Jail or unit with cameras to watch me when I sleep as well as Compensatory and punitive damages.

I Declare under penalty of perjury that
the foregoing is true and correct.

Executed on 7-22-22

Jesse J. Eden
Jesse J. Eden
65 N. Elk St.
Sandusky, MI.
48471

EVEN # 109112

Sanilac Co. Jail
65 N. Elk Street
Sandusky, MI, 49847

THIS MAIL ORIGINATED FROM THE
SANILAC COUNTY JAIL
FROM THE 2022 PM 3 L



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CLERKS OFFICE
U.S. DISTRICT COURT

UNITED States District Court
For the Eastern District of MICHIGAN
Office of the Clerk
Theodore Levin United States Courthouse
231 West Lafayette Blvd. Room 564
Detroit Michigan 48226
48226-27183

5-11-10